

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CRYSTAL CARTER, SUSAN CIFELLI, and  
LETITIA TAYLOR, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

SCRIPPS NETWORKS, LLC,

Defendant.

1:22-cv-02031-PGG

**NOTICE OF MOTION TO DISMISS THE COMPLAINT**

Defendant Scripps Networks, LLC (“Scripps”) hereby moves the Court for an order pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) dismissing the Complaint (ECF No. 1) with prejudice. The grounds supporting the motion are set forth in the memorandum of law and August 2, 2022 Declaration of Blake J. Steinberg filed with this motion to dismiss.<sup>1</sup>

---

<sup>1</sup> The original Complaint was filed against Discovery Communications, LLC (“Discovery”), but per the stipulation ordered on July 27, 2022 (ECF No. 21), Scripps was substituted for Discovery as the Defendant.

Dated: New York, New York  
August 2, 2022

/s/ David L. Yohai

David L. Yohai  
David R. Singh  
Randi W. Singer  
David E. Yolkut  
Blake J. Steinberg  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, NY 10153  
Phone: (212) 310-8000  
Fax: (212) 310-8007  
david.yohai@weil.com  
david.singh@weil.com  
randi.singer@weil.com  
david.yolkut@weil.com  
blake.steinberg@weil.com

*Attorneys for Defendant Scripps Networks,  
LLC*